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                    UNITED STATES DISTRICT COURT
8   **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,   Case No. 2:20-mj-01009-BNW

10   Plaintiff,   **Stipulation for an Order**
                                          Directing Probation to Prepare
11   v.   **a Criminal History Report**

12 OSCAR IVAN ESCOBEDO-GONZALEZ,

13   Defendant.

14

15   IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.

16 Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States

17 Attorney, counsel for the United States of America, and Monique Kirtley, Assistant Federal

18 Public Defender, counsel for Defendant OSCAR IVAN ESCOBEDO-GONZALEZ, that

19 the Court direct the U.S. Probation Office to prepare a report detailing the defendant's

20 criminal history.

21   This stipulation is entered into for the following reasons:

22   1.   The United States Attorney's Office has developed an early disposition

23 program for immigration cases, authorized by the Attorney General pursuant to the

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1 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has

2 extended to the defendant a plea offer in which the parties would agree to jointly request an

3 expedited sentencing immediately after the defendant enters a guilty plea.

4   2.   The U.S. Probation Office cannot begin obtaining the defendant's criminal

5 history until after the defendant enters his guilty plea unless the Court enters an order

6 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of

7 a defendant's initial appearance when charged by indictment.

8   3.   The U.S. Probation Office informs the government that it would like to begin

9 obtaining the criminal history of defendants eligible for the early disposition program as

10 soon as possible after their initial appearance so that the Probation Office can complete the

11 Presentence Investigation Report by the time of the expected expedited sentencing.

12   4.   Accordingly, the parties request that the Court enter an order directing the

13 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

14   DATED this 25th day of November, 2020.

15   Respectfully submitted,

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17   NICHOLAS A. TRUTANICH
                                                United States Attorney

18 */s/ Monique Kirtley*   */s/ Jared L. Grimmer*
                                                JARED L. GRIMMER
19 Assistant Federal Public Defender   Assistant United States Attorney
    Counsel for Defendant OSCAR IVAN
20 ESCOBEDO-GONZALEZ

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
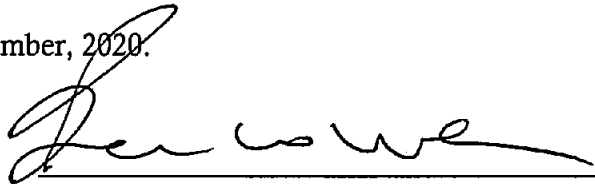
UNITED STATES OF AMERICA,	Case No. 2:20-mj-01009-BNW
Plaintiff,	**Order Directing Probation to Prepare a Criminal History Report**
v.	**[Proposed]**
OSCAR IVAN ESCOBEDO-GONZALEZ,	
Defendant.	

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this _____ day of November, 2020.

HONORABLE BRENDA N. WEKSLER
UNITED STATES MAGISTRATE JUDGE